

July 1, 1999

Jane E. Henney, M.D., Commissioner  
Food and Drug Administration  
5600 Fishers Lane  
Room 14-71  
Rockville, MD 20852

7788 '99 JUL 12 A10:15

RE: Docket #98N-1038  
Irradiation in the production,  
processing, and handling of food

Dear Dr. Henney:

I am extremely concerned about the prospect of weakening the labeling requirements for irradiated food. Any food or any foods containing ingredients that have been treated by irradiation should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed close proximity to the name of the food and be accompanied by the Radura, the international symbol of irradiated food. If the food is not packaged this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling. I recognize the Radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and Radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the Radura, new consumers (i.e., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label, consumers will be misled into believing that the food has not been irradiated.

Thank you for your consideration of these concerns.

Sincerely,



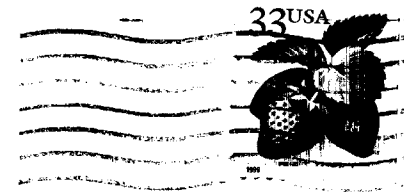
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98N 1038

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